

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In Re

**Linda M. Thake, aka  
Linda M. Mays, aka  
Linda M. Buechner,**  
Debtor.

**U.S. BANK TRUST NATIONAL  
ASSOCIATION, AS TRUSTEE OF  
BUNGALOW SERIES F TRUST,**  
Movant.

v.

**Linda M. Thake, aka  
Linda M. Mays, aka  
Linda M. Buechner,**  
Debtor,

and

**Diana S. Daugherty,** Trustee.  
Respondents.

**Case No. 15-47508-659**

**Chapter 13**

**MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY**

**MOTION WAIVES 30 DAY HEARING**

**Hearing Date: January 22, 2018  
Hearing Time: 10:00 AM  
Courtroom 7 North**

**Kozeny & McCubbin, LC  
12400 Olive Blvd., Suite 555  
St. Louis, MO 63141  
edmo@km-law.com**

**NOTICE OF HEARING**

PLEASE TAKE NOTICE,

that upon the annexed motion of U.S. BANK TRUST NATIONAL ASSOCIATION, AS TRUSTEE OF BUNGALOW SERIES F TRUST, dated December 18, 2017, seeking the termination of the automatic stay with regard to certain real estate commonly known as 4058 Humphrey St, Saint Louis, MO 63116 the undersigned will move before the Honorable Judge Kathy A. Surratt-States in the 7 North Courtroom, of the United States Bankruptcy Court for the EASTERN DISTRICT OF MISSOURI, 111 S. 10th Street, St. Louis, MO 63102, at 10:00 AM, on Monday, January 22, 2018, or as soon thereafter as counsel may be heard for an order:



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- (a) terminating the stay to allow immediate foreclosure of Movant's lien;
- (b) authorizing Movant to immediately pursue its state court remedies for possession of said real estate;
- (c) waiving the 14 day stay period pursuant to Rule 4001;
- (d) granting such other and further relief as may be deemed just and proper;

**MOVANT WAIVES THIRTY (30) DAY HEARING REQUIREMENT;**

**WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY JANUARY 15, 2018. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING. REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.**

Respectfully submitted,

/s/Jonathon B. Burford  
Jonathon B. Burford, #59337MO  
Attorneys for Movant  
12400 Olive Blvd., Suite 555  
St. Louis, MO 63141  
Phone: (314) 991-0255  
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edmo@km-law.com



I certify that a true copy of the Above Pleading was served either electronically or via first class mail on December 18, 2017, upon the following parties:

Linda M. Thake  
Debtor  
4058 Humphrey St.  
Saint Louis, MO 63116

Ross H. Briggs  
Attorney for Debtor  
4144 Lindell Blvd, Suite 202  
St. Louis, MO 63108

Diana S. Daugherty  
Trustee  
PO Box 430908  
St. Louis, MO 63143

U.S. Trustee  
Office of the US Trustee  
111 S. 10th St., Ste. 6.353  
St. Louis, MO 63102

/s/ Jessica Werner  
Jessica Werner



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